

## REMARKS

### 103 Rejection:

Claims 1 - 8 were rejected for being unpatentable over Seguchi et al, (US 6,401,849 B1) in view of Robinson et al (US 6,491,126 B1). Applicants respectively disagree with the Examiner's reading of Seguchi, and further respectfully suggest that the amendment to Claim 1 makes said reading moot (namely, amended Claim 1 defines patentable subject matter, whether the Examiner's reading of Seguchi is or is not correct).

### Teachings of Seguchi:

The Examiner construes Seguchi as two electric motors. Applicants respectfully disagree. Seguchi employs the use of one electric motor, having one stator and two co-axially disposed rotors, the output torque of which is dependent on the output torque of the other. Namely, the torque on one set of wheels (front or rear of Seguchi) constitutes the torque of the rotor which is coupled to those wheels which are induced by electric current /ess a reaction torque in an amount which is equal to the torque on the *opposite* (rear or front) set of wheels.

Applicants therefore respectfully submit that Seguchi does not teach use of two motors, at least not two motors which are independent of the other. By design, the torque applied to the front set of wheels is subtracted from torque applied to the rear wheels and vice-versa. By contrast, the two motors of Applicants' invention are separate, independently operable motors.

In addition thereto, no means is provided in Seguchi to selectively connect or disconnect either of the rotors of the Seguchi motor from their respective output shaft. Accordingly, the Seguchi vehicle cannot be selectively operated as a four-wheel drive vehicle, a front-wheel drive vehicle, a rear-wheel drive vehicle, with all four-wheels disconnected from the rotors of the motor (to reduce drag when towing or pushing the vehicle), or with front and rear wheels rotating in opposite directions (which does have some utility, such as, for instance, pushing or pulling a stuck vehicle sideways), all of which is possible with the vehicle of Applicants' invention.

Applicants have cancelled original, independent Claim 1 and replaced same with new independent Claim 9. Applicants respectfully submit that new Claim 9 cures the issues (noted by the Examiner) with respect to old (now cancelled) Claim 1. Namely, new Claim 9 removes the language "means for selectively controlling the power and polarity of the electrical power to each of said electric motors" which the Examiner found objectionable in old, cancelled Claim 1, and second new Claim 9 more clearly distinguishes Applicants' invention from Seguchi - namely by setting forth that:

- a. the front and rear motors of Applicants' invention are "*independently operable*" (element a. of Claim 1);
- b. in elements c. and d. the front (independently operable) electric motor is "*selectively connectable*" and "*selectively disconnectable*" to the front drive mechanism; and,
- c. in elements k. and l. the rear (independently operable) electric motor is "*selectively connectable*" and "*selectively disconnectable*" to the rear drive mechanism.

Accordingly, Applicants respectfully suggest, new Claim 9 defines subject matter patentably distinct from Seguchi or Seguchi in combination with Robinson.

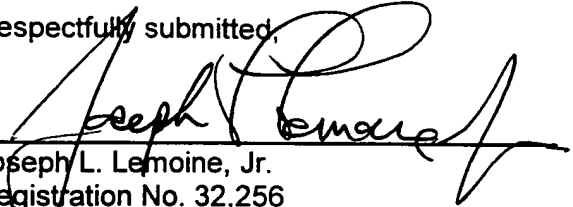
#### CONCLUSION:

For all of the above reasons, Applicants submit that the claims are in proper form and that the claims define patentable subject matter over the cited prior art. Therefore, applicants respectfully request that the amendments be entered into the case, submit that the amended claims place this application in condition for allowance, and respectfully request allowance thereof.

Applicants further respectfully request early consideration of this Response and allowance thereafter. Should the Examiner believe that a telephonic interview would be helpful in resolving any further questions, please contact the undersigned at the listed telephone number.

A duplicate copy of this letter is attached.

Respectfully submitted,



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